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SOUTHWEST GAS CORPORATION

James F. Wunderlin, P.E., Vice President/Engineering

September 26, 2000

DOT Dockets Unit, Plaza 401
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590-0001

DOT-2 F 7100.2-1
SEP 28 2000

RE: Pipeline Safety: Revision of Natural Gas Transmission and Gathering
Pipeline Incident and Annual Report Forms, Docket No. RSPA-98-4957 - 28

Dear Sir or Madam:

Southwest Gas Corporation (Southwest) is a natural gas local distribution company serving over 1.3 million customers in Arizona, California and Nevada. Southwest owns and operates approximately 1,434 miles of transmission and 20,597 miles of distribution pipelines.

Southwest supports the efforts of the Research and Special Programs Administration (RSPA) to revise and update pipeline safety forms and data collection procedures in order to improve clarity, and provide for the identification of accident trends and evaluations of pipeline operator performance.

Southwest respectfully submits the following comments concerning the proposed revisions:

Form RSPA F 7100.2-1 (3-00): Annual Report for Gas Transmission & Gathering Systems

Part B – System Description

Item No. 3 – Miles of Pipe by Decade of Installation

Southwest supports this change to the form. This information is available in our data files and can be entered into the form with minimal economic impact. Southwest utilizes this information as a part of the operation and maintenance activities.



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Part B – System Description

Item No. 4 – Miles of Pipe by Class Location

Southwest does not support this proposed change to the form. Southwest currently maintains this information in hardcopy form only. To gather this information into a useful database would be very labor intensive. The initial cost analysis would result in an economic impact of approximately \$100,000. Southwest does not believe the compilation of this information will result in any increase in pipeline safety.

Part C – Total Leaks Eliminated/Repaired During Year

The RSPA revisions to the form for this section include the following reporting categories:

- Corrosion
- Natural Forces
- Encroachments and Previously Damaged Pipe
- Material and Welds
- Equipment
- Incorrect Operation
- Other

Southwest would like to suggest that the form revision include these alternate categories:

- Corrosion
- Outside Forces (Natural)
- Previous Damage
- Construction/Material Defects
- 3rd Party Damage
- Operator Error
- Other

Southwest agrees that the “Corrosion” and the “Natural Forces” categories are valid and meaningful for tracking purposes. Southwest disagrees with the “Equipment” and “Incorrect Operation” categories, as these are ambiguous. The inclusion of the “Equipment” and “Incorrect Operation” categories would lead to confusion and would result in collection of data that is inconsistent.



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Southwest generally agrees with the inclusion of "Previously Damaged Pipe," but we fail to see the benefit of the use of the term "encroachments." This term has not been well defined in the regulations, and it is a term normally perceived in the industry as a condition where buildings or structures have been improperly placed over a pipeline subsequent to its construction. In accordance with the industry definition, "encroachments" would be a condition incidental or possibly contributing to, but would not be considered the cause of a gas incident.

Southwest would like to suggest alternate categories of "Construction/Material Defects" and "3rd Party Damage." These categories would more closely reflect some of the major causes of gas incidents as supported by existing data. Southwest believes that tracking 3rd party damages would be more consistent with the current efforts by the Office of Pipeline Safety to promote and support damage prevention education and enforcement activities.

Form RSPA F 7100.2 (3-00): Incident Report – Gas Transmission and Gathering Systems

**Part A – General Report Information
Item #5(d)**

Southwest would like to comment that a definition of a "High Consequence Area" has not been finalized and the RSPA currently has rulemaking that addresses this issue. We would suggest that this item not be included in the revisions to this form until this process has been completed. Including this information on the form at this time would add confusion to operators and lead to inaccurate and inconsistent reporting information.

**Part A – General Report Information
Item #6 – Elapsed Time Until Area Was Made Safe**

Southwest would like to suggest that the RSPA clearly define the term "made safe." The definition used currently often varies between operators and regulatory agencies. Gas incidents involve circumstances that constantly change and that are difficult to predict, even under the best conditions. For these, and other reasons, the time factor required to "make safe" will continue to vary with actual on-site conditions and judgment decisions made by experienced operators. In order to establish consistent reporting and data compilation Southwest suggests that a clear definition be provided for the operators.



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Part F – Apparent Cause
Item F2 – Outside Force Damage

Southwest would like to suggest that the category “encroachments” be deleted. Item #11 “Vandalism” could be moved under the category of “Third Party Damage,” as vandalism is damage to a pipeline facility by someone other than the operator.

Southwest appreciates this opportunity to participate in the proposed rulemaking and forms revision process. The focus on practicality and effectiveness of reporting and data collection requirements will help Southwest to continue to provide safe, reliable and cost-effective service to its customers.

Sincerely,

James F. Wunderlin, P.E.
Vice-President/Engineering

JFW/JBC: dmg
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